

Sonar

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May 16, 2001

Donna Wieting, Chief
Marine Mammal Conservation Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910-3226

Dear Chief Wieting:

I have read the entire proposed rule (50 CFR Part 216, published March 19, 2001) regarding the proposed Navy "small take" of marine mammals. I also attended the Los Angeles Hearing on this proposal held April 2000. I have too many serious concerns with this proposal to list here, but I would be happy to discuss further with your team.

Key Issues:

1. The Los Angeles hearing speakers (except for the Navy representative) were unanimous in opposition to LFA Surtass sonar.
2. The NMFS's duty is towards the ocean inhabitants, not the Navy.
3. With limited research, absence of evidence of major negative impact data on marine mammals is not equivalent to evidence of safety. Inadequate research does not allow approval of potentially devastating and irreversible technology effects.
4. Although best available evidence shows that 145 db sonar is dangerous to humans [p. 15387], the Navy claims that anything less than 180 db (isopleth) is acceptable to mammals with even more sensitive hearing. This is not logical.
5. Data collecting and analysis by the *Ornithology* department [Cornell] on whale songs funded by a Navy grant with such transparent objectives as this one is ethically challenged.
6. A technology that affects the future of the entire world's oceans should at least be discussed in the United Nations. Just because we can financially afford to pollute the oceans with high sound levels does not mean we can politically afford to do so at the expense of world opinion.
7. The LFA Surtass Sonar is opposed by Humane Society of the United States, Natural Resources Defense Council, Pacific Whale Foundation, Animal Welfare Institute, Animal Protection Institute, Ocean Futures Society (Jean-Michel Cousteau, president). See below.
8. The NMFS has disallowed its own opinion of the strategic value of proposed Navy technologies (passive vs. active sonar). The best available evidence is that 180 db LFA sonar will have more than a negligible impact on affected species and stocks of marine mammals. **Therefore, the NMFS should not approve this proposal.** If the whales die, man will die of loneliness.

Sincerely,


Lydell Anderson, M.D.
Long Beach, CA
562-408-1642

(See attached)

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The following Web Links are provided for your information and convenience only:

Natural Resources Defense Council

<http://www.nrdc.org/wildlife/marine/ojrlfa.asp>

Ocean Futures Society (Jean-Michel Cousteau, president)

<http://www.oceanfutures.org/jmc/lfa1.html>

A first hand report by Ken Balcomb, marine biologist, of Navy induced whale deaths in the Bahamas

<http://www.whaleresearch.com/news.shtml#bahamas>

Humane Society of the United States

<http://www.hsus.org/whatnew/sonar100699.html>

Pacific Whale Foundation

<http://www.pacificwhale.org/news/LFA.html>

Animal Welfare Institute

<http://www.awionline.org/pubs/Quarterly/Summer2000/navy.htm>

Animal Protection Institute

<http://www.api4animals.org/areas.asp?c=5&ID=600>